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Attorney for Defendant
Min Young Bang

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ooo

UNITED STATES OF AMERICA,

NO. CR. 05-00395-CRB

Plaintiff,

vs.

YOUNG JOON YANG, et al.,

**DECLARATION OF COUNSEL
IN SUPPORT OF RETURN OF
DEFENDANT S PASSPORT**

Defendants.

/
I, Randy Sue Pollock, declare and state as follows:

1. That I am an attorney duly licensed to practice law before the Courts of the State of California and the United States District Court for the Northern District of California;.
2. That I am the court-appointed counsel for defendant Min Young Bang, in CR. No. 05-00395-CRB;
3. This declaration is made in support of an *ex parte application* of defendant for the return of his Korean;
4. On July 7, 2006, defendant Bang was sentenced to three years supervised release;
5. On October 2, 2006, Mr. Bang appeared before the Immigration Court and was granted a voluntary departure. He is a citizen of Korea;

1 6. Mr. Bang is scheduled to leave the United States in the first week of March;
2 7. In order to finalize his travel plans Mr. Bang needs his passport that was
3 surrendered to this Court on December 19, 2005;
4 8. AUSA Peter Axelrod has no objection to returning the passport to Mr. Bang so
5 that he can go back to Korea.

6
7 I declare under penalty that the above is true and correct to the best of my knowledge.
8 Executed this 25th day of February, 2007 in Oakland, CA.

9
10 /s/ Randy Sue Pollock
11 Randy Sue Pollock
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5 MIN YOUNG BANG

6
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 ooo

11 UNITED STATES OF AMERICA, CR. 05-00395-CRB
12 Plaintiff,

13 vs.

14 **[PROPOSED] ORDER TO RETURN
PASSPORT TO DEFENDANT**

15 Defendants

16 /
17
18 GOOD CAUSE SHOWN, based on the fact that defendant Min Young Bang has been
19 sentenced and is on supervised release and plans to return to Korea in March 2007,
20 IT IS HEREBY ORDERED that his passport that was surrendered to the U.S. District Court
21 Clerk on December 19, 2005, shall be returned to him.
22

23 Date: February 27, 2007

